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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

12
13 CHASOM BROWN, *et al.*,

14 Plaintiffs,

15 v.

16 GOOGLE LLC,

17 Defendant.
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Case No. 5:20-cv-03664-LHK-SVK

**STIPULATION AND [PROPOSED]
ORDER SETTING BRIEFING
SCHEDULE FOR DISCOVERY
DISPUTES**

Judge: Honorable Susan van Keulen

1 Pursuant to Civil Local Rules 7-11 and 7-12, Plaintiffs and Defendant Google LLC jointly
2 request entry of an order scheduling briefing regarding discovery disputes on which the parties
3 have reached impasse. The Parties stipulate as follows:

4 WHEREAS, the Parties conferred on Plaintiffs' requests to take apex depositions of
5 Alphabet and Google's Chief Executive Officer Sundar Pichai and Chief Marketing Officer
6 Lorraine Twohill, which Google opposes, and have reached impasse; and
7

8 WHEREAS, the Parties seek the Court's guidance on its preferred method for briefing
9 these two discovery disputes; and

10 WHEREAS, the Parties are continuing to meet and confer regarding disputes related to
11 Google's responses to Plaintiffs' Interrogatory Nos. 8 and 11-17; and

12 WHEREAS, the Parties seek the Court's guidance on its preferred method for briefing this
13 discovery dispute in the event of impasse following continued meet and confer negotiations; and
14

15 NOW, THEREFORE, the Parties stipulate to the following briefing schedule for these
16 disputes:

- 17 1. The Parties are to file a single, joint letter brief not to exceed five pages regarding
18 the apex deposition of Ms. Lorraine Twohill at 8:30 p.m. Pacific Time on December
19 15, 2021, with an option for both Parties to stipulate to a slightly later filing, if
20 necessary.
- 21 2. The Parties are to file a single, joint letter brief not to exceed five pages regarding
22 the apex deposition of Mr. Sundar Pichai at 5:30 p.m. Pacific Time on December 17,
23 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.
- 24 3. The Parties are to continue meeting and conferring regarding Google's responses to
25 Plaintiffs' Interrogatory Nos. 8 and 11-17. If the Parties are unable to reach a
26 resolution, the Parties may file a single, joint letter brief not to exceed five pages.

1 DATED: December 14, 2021

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ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER SETTING BRIEFING SCHEDULE FOR DISCOVERY DISPUTES. I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: December 14, 2021

By /s/ Andrew H. Schapiro
Andrew H. Schapiro
Counsel on behalf of Google

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby ORDERS:

The parties are to submit briefing according to the following schedule:

1. The Parties are to file a single, joint letter brief not to exceed five pages regarding the apex deposition of Ms. Lorraine Twohill at 8:30 p.m. Pacific Time on December 15, 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.
2. The Parties are to file a single, joint letter brief not to exceed five pages regarding the apex deposition of Mr. Sundar Pichai at 5:30 p.m. Pacific Time on December 17, 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.
3. The Parties are to continue meeting and conferring regarding Google's responses to Plaintiffs' Interrogatory Nos. 8 and 11-17. If the Parties are unable to reach a resolution, the Parties may file a single, joint letter brief not to exceed five pages.

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge